

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO SUBMIT CERTIFIED TRANSLATIONS IN CONNECTION WITH
DOCKETED CLAIM OBJECTION RESPONSES TO BE HEARD AT THE JANUARY
14, 2021 ADJOURNED OBJECTION HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully file this motion in compliance with the Court’s *Order Regarding Adjourned Omnibus Objections to Claims* [ECF No. 15437] (the “Adjourned Objection Hearing Procedures Order”) directing the Oversight Board to file (i) any responses that were not filed on the docket and/or (ii) certified translations of any Spanish-language responses to claims that the Debtors intend to prosecute at the hearing to be held on January 14, 2021. *Adjourned Objection Hearing Procedures Order* at 2.

Attached hereto as Exhibit 1 is a certified translation of the response [ECF No. 13164] (the “First Romero Quinones Response”) filed by Maria Romero Quinones (“Romero Quinones”) in response to the *One Hundred Seventy-First Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient and Late-filed Claims* [ECF No. 12125] (the “One Hundred Seventy-First Omnibus Objection”).

Attached hereto as Exhibit 2 is a certified translation of the response [ECF No. 13165] (the “Second Romero Quinones Response,” and together with the First Romero Quinones Response, the “Romero Quinones Responses”) filed by Romero Quinones in response to the One Hundred Seventy-First Omnibus Objection.

Attached hereto as Exhibit 3 is a certified translation of the response [ECF No. 13789] (the “Montalvo Response”) filed by Eddie Montalvo (“Montalvo”) in response to the *Two Hundred First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims Asserted by COFINA Bondholders* [ECF No. 13410] (the “Two Hundred First Omnibus Objection”).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Attached hereto as Exhibit 4 is a certified translation of the response [ECF No. 13643] (the “First Martínez Vélez Response”) filed by Ruth Dalia Luisa Martínez Vélez (“Martínez Vélez”) in response to the *Two Hundred Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [ECF No. 13412] (the “Two Hundred Fourth Omnibus Objection”).

Attached hereto as Exhibit 5 is a certified translation of the response [ECF No. 13646] (the “Second Martínez Vélez Response”) filed by Martínez Vélez in response to the Two Hundred Fourth Omnibus Objection.

Attached hereto as Exhibit 6 is a certified translation of the response [ECF No. 13647] (the “Third Martínez Vélez Response”) filed by Martínez Vélez in response to the Two Hundred Fourth Omnibus Objection.

Attached hereto as Exhibit 7 is a certified translation of the response [ECF No. 13649] (the “Fourth Martínez Vélez Response,” and together with the First Martínez Vélez Response, Second Martínez Vélez Response, and Third Martínez Vélez Response, the “Martínez Vélez Responses”) filed by Martínez Vélez in response to the Two Hundred Fourth Omnibus Objection.

Additional responses that were not filed on the docket, as well as certified translations thereof, are being submitted via notices of correspondence submitted contemporaneously herewith.

Courtesy copies of these responses and certified translations will also be e-mailed to chambers in the form of a PDF binder.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of the filing of these responses and certified translations in compliance with the Court’s orders.

Dated: January 4, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

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